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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

11 In re
12 JADOOtv, INC.
13 Debtor.

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Bankruptcy Case No. 19-41283 (WJL)
Chapter 11
R.S. No. BN-001

JOINT STATEMENT REGARDING
MOTION TO APPROVE
STIPULATION FOR RELIEF FROM
STAY

Date: September 9, 2020
Time: 10:30 a.m.
Ctrm: TELEPHONIC
Room 220
1300 Clay Street
Oakland, CA 94612

Creditor JPMorgan Chase Bank, N.A. (“JPMC”) and debtor JadooTV, Inc. (“Debtor”), through their undersigned counsel, submit the following *Joint Statement Regarding Motion to Approve Stipulation for Relief From Stay* (“Joint Statement”).

On August 11, 2020, JPMC and Debtor, through their respective counsel, entered into the *Stipulation for Relief from the Automatic Stay*. Also on August 11, 2020, JPMC filed the *Motion to Approve Stipulation for Relief from the Automatic Stay* [Dkt. No. 298] (the “Motion”). A hearing on the Motion is scheduled for September 9, 2020 at 10:30 a.m.; any opposition was due

1 by August 26, 2020. *See Notice of Motion to Approve Stipulation for Relief from the Automatic*
2 *Stay* [Dkt. No. 299].

3 On August 26, 2020, the U.S. Small Business Administration (“**SBA**”) filed the *U.S.*
4 *Small Business Administration’s Statement of Non-Opposition to Motion to Approve Stipulation*
5 *for Relief From the Automatic Stay* [Dkt. No. 304]. As of the date of this Joint Statement, no other
6 response has been filed to the Motion. JPMC and the Debtor have not received any informal
7 opposition to the Motion.

8 In response to comments from the SBA, JPMC made one clarifying change to the
9 proposed order approving the Motion, which change has been approved by counsel to the Debtors
10 and is reflected in the redlined proposed order attached hereto as **Exhibit A**.

12 DATED: September 1, 2020

13 BUCHALTER
14 A Professional Corporation

15 By: /s/ Valerie Bantner Peo
16 VALERIE BANTNER PEO
17 Attorneys for Creditor
18 JPMorgan Chase Bank, N.A.

18 DATED: September 1, 2020

19 KELLER BENVENUTTI KIM LLP

20 By: /s/ Jane Kim
21 JANE KIM
22 Attorneys for Debtor
23 JadooTV, Inc.

EXHIBIT A

1 BUCHALTER, A Professional Corporation
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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re

Bankruptcy Case No. 19-41283 (WJL)

JADOOtv, INC.

Chapter 11

Debtor.

R.S. No. BN-001

ORDER LIFTING THE AUTOMATIC
STAY AND GRANTING RELATED
RELIEF

Date: September 9, 2020
Time: 10:30 a.m.
Ctrm: TELEPHONIC
Room 220
1300 Clay Street
Oakland, CA 94612

A hearing was held at the above-captioned date and time on the *Motion to Approve Stipulation for Relief from the Automatic Stay* (“**Motion**”) filed by JPMorgan Chase Bank, N.A. (“**JPMC**”) and the *Stipulation For Relief From The Automatic Stay* (“**Stipulation**”) between JPMC and JadooTV, Inc. (“**Debtor**”), attached as Exhibit 1 to the Motion. Appearances were stated on the record.

The Court, having considered the Motion, finds that the Court has jurisdiction over the parties and the subject matter, and further finds that notice was appropriate under the

circumstances, and other good cause appearing, hereby

ORDERS, as follows:

1. The Motion is granted;
2. The Stipulation is approved;
3. The PPP Motion is denied as moot;
4. Relief from the automatic stay under 11 U.S.C. § 362(a) is granted to allow JPMC
exercise all of its rights and remedies under the Account Agreement,¹ the PPP Note and
cable law, including the right of offset, to the extent of the Default Amount;
5. The fourteen day stay of prescribed under Rule 4001(a)(3) of the Federal Rules of
Bankruptcy Procedure is waived; and
6. This Order shall be remain binding and effective upon any conversion of this case
to another chapter under the Bankruptcy Code.

** END OF ORDER **

APPROVED AS TO FORM:

DATED: September 1 ~~August 11~~, 2020 KELLER BENVENUTTI KIM, LLP

By: /s/ Jane Kim
JANE KIM
Attorneys for Debtor JadooTV, Inc.

¹ Capitalized terms used herein shall have the meanings ascribed to them by the Stipulation.